

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-MJ-6079-STRAUSS

UNITED STATES OF AMERICA

v.

COURTNEY ROBERT CHONG,

Defendant.

FILED BY AT D.C.

**Feb 24, 2024**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - FTL

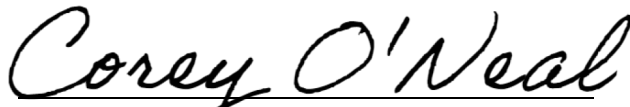
CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

BY:



COREY R. O'NEAL  
ASSISTANT UNITED STATES ATTORNEY  
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500 East Broward Blvd., Suite 700  
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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

FILED BY AT D.C.

**Feb 24, 2024**

ANGELA E. NOBLE  
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S. D. OF FLA. - FTL

United States of America

v.

Courtney Robert Chong

Case No. 24-MJ-6079-STRAUSS

*Defendant(s)*

**CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 23, 2024 in the county of Broward in the  
Southern District of Florida, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 2252(a)(1) & (b)(1)

Transportation of child pornography

18 U.S.C. § 2252(a)(4)(B) & (b)(2)

Possession of child pornography

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.



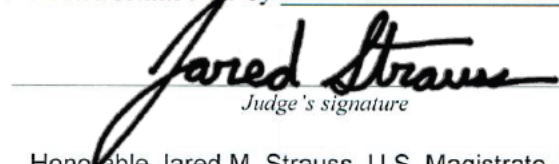
*Complainant's signature*

Jerome Long, HSI

*Printed name and title*

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 41 by FaceTime

Date: February 24, 2024



*Judge's signature*

City and state: Fort Lauderdale, Florida

Honorable Jared M. Strauss, U.S. Magistrate Judge  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Jerome Long, being first duly sworn, hereby depose and state as follows:

1. I am employed as a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI). Prior to joining HSI, I was a Federal Air Marshal with the United States Transportation Security Administration, Federal Air Marshals Service (FAMS). Prior to joining FAMS, I was a United States Customs and Border Protection Officer. In my current capacity as an HSI Special Agent, I am assigned to the Special Victims Group (SVG) and am responsible for conducting child exploitation investigations. Specifically, I investigate crimes relating to the sexual exploitation of children, including but not limited to the enticement and attempted enticement of a minor to engage in sexual criminal activity, as well as the production, transportation, distribution, receipt, and possession of child pornography, in violation of Title 18, United States Code, Sections 2422(b), 2251, 2252, and 2252A. I have conducted and/or assisted in child exploitation investigations and received training in how to conduct such investigations. As a part of my duties, I have observed and reviewed numerous examples of child pornography, as defined in Title 18, United States Code, Section 2256, in all forms of media, including computer media. I am familiar with the tactics used by individuals who collect and distribute child pornographic material.

2. As an investigative or law enforcement officer, within the meaning of 18 U.S.C. § 2510(7), I am empowered by law to conduct investigations and to make arrests for violations of Title 18 of the United States Code.

**PURPOSE OF THE AFFIDAVIT**

3. I submit this Affidavit for the limited purpose of establishing probable cause that Courtney Robert CHONG (hereinafter "CHONG") committed violations of Title 18, United States Code, Sections 2252(a)(1) and (b)(1) (transportation of child pornography), and 2252(a)(4)(B) and (b)(2) (possession of child pornography).

4. I respectfully submit that there is probable cause to believe that on or about February 23, 2024, CHONG knowingly transported and possessed child pornography on his cellular phone, described as an Apple iPhone 11 Pro Max.

5. The statements contained in this Affidavit are based on my personal knowledge, as well as information relayed to me by other individuals and law enforcement officers. I have not included in this Affidavit each and every fact known to me. Rather, I have included only the facts that are sufficient to establish probable cause for the issuance of a criminal complaint against CHONG for the above-described criminal violations.

### **FACTUAL BACKGROUND**

6. On or about February 23, 2024, Courtney Robert Chong, a United States Lawful Permanent Resident, arrived at the Fort Lauderdale-Hollywood International Airport (FLL), on JetBlue Airways Flight Number 1676, from Kingston, Jamaica. United States Customs and Border Protection (CBP) officers referred CHONG to passport control secondary for further processing and examination of his purpose of travel.

7. During the secondary examination, CHONG advised that he traveled to Jamaica for vacation and to renew his Jamaican passport. CHONG was in possession of an Apple iPhone 11 Pro Max cellular phone (the “iPhone 11”), a OnePlus Nord N2005g cellular phone, and an Apple MacBook Pro computer, among other personal items. CBP officers conducted a cursory search of CHONG’s iPhone 11 Pro Max after CHONG provided the passwords for the devices. During their inspection, CBP officers discovered numerous photographs and videos of naked, underage girls and boys engaged in sexual activity. CBP officers subsequently contacted your Affiant, who responded to FLL to conduct further investigation.

8. At FLL, your Affiant and CBP officers conducted a further review of CHONG's iPhone 11. During this review, law enforcement discovered multiple images and videos depicting pre-pubescent and pubescent children engaged in sexual acts, to include the following:

- A two minute, fifty-seven second video that depicts a pubescent girl undressing in front of a camera, exposing her naked body on a bed, and engaging in vaginal penetrative sex with two adult males. The title of the video is FABIOLITA 13 AÑITOS SU PRIMER CASTING which translates to Little Fabiola 13 years old her first casting.
- A fifty-nine second video that depicts a girl approximately ten to twelve years of age engaged in oral sex with an adult male who ejaculates on her face.
- A two minute, thirty second video depicting a blindfolded six to eight year-old boy being anally penetrated on a bed while a another pubescent child masturbates in the background. At the end of the video, what appears to be an adult male can be seen being masturbated by the same six-to eight-year-old boy as he is anally penetrated.
- A thumbnail photo of a forty second video that depicts an adult male putting his penis in the mouth of a toddler less than two years old.

7. Your affiant and other law enforcement officers conducted an audio/video recorded interview of CHONG at FLL. Law enforcement advised CHONG of his *Miranda* rights. CHONG stated that he understood his rights, waived his rights in writings, and agreed to speak to law enforcement. During the interview, CHONG said he is aware that there is child pornography on his iPhone 11. He used the Telegram social networking platform to obtain and distribute images of child pornography via links on Telegram that could be downloaded to his cellular phone. He further said that he would find the child pornography/child sexual abuse material (CP/CSAM) videos in various chat groups on Telegram, download the videos to his phone, and then send the videos to other individuals on Telegram. CHONG said he purchased "links" on Telegram via CashApp. When asked specifically about the images and videos on his iPhone 11, CHONG admitted to obtaining over one-hundred CP/CSAM videos and images on the phone which he viewed, saved, and at times, distributed to others.

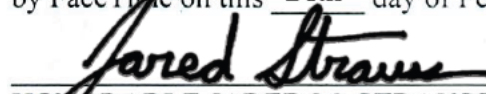
**CONCLUSION**

Based on my training and experience, and the information contained herein, I respectfully submit that probable cause exists to believe that on or about February 23, 2024, CHONG knowingly transported and possessed child pornography in violation of Title 18, United States Code, Sections 2252(a)(1) and (b)(1) (transportation of child pornography), 2252(a)(4)(B) and (b)(2) (possession of child pornography).

**FURTHER YOUR AFFIANT SAYETH NAUGHT.**

  
SPECIAL AGENT JEROME LONG  
HOMELAND SECURITY INVESTIGATIONS

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
by FaceTime on this 24th day of February, 2024.

  
HONORABLE JARED M. STRAUSS  
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NUMBER:** 24-MJ-6079-STRAUSS

**BOND RECOMMENDATION**

DEFENDANT: COURTNEY ROBERT CHONG

Pre-Trial Detention

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: \_\_\_\_\_

AUSA: Corey R. O'Neal

Last Known Address: 27 Juliette Street, #1

Dorchester, Massachusetts

01122

What Facility: \_\_\_\_\_

Agent(s):

Jerome Long

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)

Homeland Security Investigations